

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

HAROLD JOSEPH KENDALL,)	
individually and as the Administrator of)	
the Estate of SHANE MIGUEL)	
KENDALL,)	
)	
Plaintiffs,)	
)	
v.)	
)	
FULTON COUNTY, GEORGIA, a)	CIVIL ACTION FILE NO.
political subdivision of the State of)	1:23-cv-00416-JPB
Georgia; NAPHCARE, INC. an)	
Alabama corporation,)	
MICHAEL AGYEI, individually and,)	
EDITH NWANKWO, individually.)	
)	
Defendants.)	

CONSENT MOTION FOR PROTECTIVE ORDER

Plaintiff and Defendants pursuant to Fed. R. Civ. P. 26(c) move this Court to enter their Proposed Consent Protective Order in the above-styled case. In support of this Motion, the Parties submit the following:

1.

Plaintiff has served certain interrogatories and requests for production of documents on Defendants and intends to request certain depositions of Defendants

relating to information that can cause Defendants undue burden or expense if it becomes publicly available without condition or limitation.

2.

It is Defendants' contention that the information that could be potentially discoverable is likely to cause Defendants undue burden or expenses because it relates to policies and procedures, personnel records, investigation files, training programs, financial records, employment records, or other documents that contain personal, proprietary, or trade secret information.

3.

To avoid the potential for unnecessary litigation or waste of time regarding the requested information, Defendants and Plaintiffs wish to enter into a protective order with terms and conditions substantially similar to those listed in Fed. R. Civ. P. 26(c)(1).

4.

WHEREFORE, we request that this Court grant our Motion and enter the Proposed Consent Protective Order, which has been filed with this Motion.

This the 30th day of August, 2024.

PREPARED AND CONSENTED TO BY:

HUFF, POWELL & BAILEY, LLC

/s/ Antonio E. Veal
Michael G. Frankson
Georgia Bar No. 173835
Antonio E. Veal
Georgia Bar No. 460007

*Counsel for Defendants NaphCare,
LLC and Michael Agyei and Edith
Nwankwo*

999 Peachtree Street, NE,
Suite 950
Atlanta, Georgia 30309
(404) 892-4022
mfrankson@huffpowellbailey.com
aveal@huffpowellbailey.com

KAUFMAN LAW FIRM LLC

/s/ Rachel Kaufman (signed with
express permission)
RACHEL M. KAUFMAN
Georgia Bar No. 491375

Counsel for Plaintiff

133 Nassau Street NW
Atlanta, Georgia 30303-2035
rachel@rachelkaufmanlaw.com

**OFFICE OF THE FULTON COUNTY
ATTORNEY**

/s/ Sandy Milord

Sandy Milord
Senior Assistant County Counsel
Georgia Bar No. 622391
Sandy.Milord@fultoncountyga.gov

Counsel for Defendant Fulton County

141 Pryor Street, SW, Suite 4038
Atlanta, Georgia 30303
(404) 612-0243